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Attorneys for Defendant
ALI EBRAHIMZADEH

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

IRANIAN AMERICANS FOR
LIBERTY INSTITUTE,

Plaintiff,

vs.

ALI EBRAHIMZADEH, et al.,

Defendants.

) Case No.: 2:22-CV-09240

) **DECLARATION OF JEFFREY**
) **LEWIS IN OPPOSITION TO**
) **MOTION PURSUANT TO RULE**
) **56(d) TO PERMIT DISCOVERY**

) Judge: Hon. Michael W. Fitzgerald
) Date: March 13, 2023
) Time: 10:00 a.m.
) Location: Courtroom 5A

I, Jeffrey Lewis, declare as follows:

1. I am counsel for Defendant Ali Ebrahimzadeh (“Ebrahimzadeh”).

2. I have personal knowledge of the truth and accuracy of the facts set forth herein, and if called upon as a witness, I could competently testify thereto. I do not intend to waive the attorney-client privilege or work product doctrine by making any statement herein.

3. I met and conferred with Plaintiff’s counsel via telephone on February 9, 2023. We could not agree on the scope of permitted discovery, however, we did agree that the court should resolve legal issues before discovery if possible.

DECLARATION



1 4. During the meet and confer, counsel discussed how expensive
2 discovery is and how Ebrahimzadeh intended to file a fee motion
3 encompassing time spent on all discovery activities at the conclusion of this
4 case.

5 5. During the meet and confer, counsel discussed how Ebrahimzadeh
6 would require an interpreter if a deposition were to take place.

7 6. In January 2023, Masih Alinejad, a well known journalist and
8 activist for Iranian rights, was the subject of widespread news accounts of a
9 plot to kill her in her home state of New York. Examples of the news accounts
10 include:

11 a. [https://www.cnn.com/2023/01/27/politics/justice-department-](https://www.cnn.com/2023/01/27/politics/justice-department-masih-alinejad/index.html)
12 [masih-alinejad/index.html](https://www.cnn.com/2023/01/27/politics/justice-department-masih-alinejad/index.html)

13 b. [https://www.cbsnews.com/newyork/news/masih-alinejad-murder-](https://www.cbsnews.com/newyork/news/masih-alinejad-murder-plot-new-york-city-charges/)
14 [plot-new-york-city-charges/](https://www.cbsnews.com/newyork/news/masih-alinejad-murder-plot-new-york-city-charges/)

15 I declare under penalty of perjury under the laws of the state of
16 California that the foregoing is true and correct.

17 Executed this 17th day of February 2023, at Rolling Hills Estates,
18 California.

19 /s/ Jeffrey Lewis

20 Jeffrey Lewis

